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13 Attorneys for Defendant
14 CITY AND COUNTY OF SAN FRANCISCO

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION**

17 SELINA KEENE, MELODY FOUNTILA,
18 MARK MCCLURE,

19 Plaintiffs,

20 v.

21 CITY AND COUNTY OF SAN FRANCISCO

22 Defendant.

23 Lead Case No. 4:22-cv-01587-JSW

24 Case No. 4:22-cv-07455-JSW (*Debrunner Action*)

25 **STIPULATION AND [PROPOSED] ORDER
26 EXTENDING TIME TO FILE ANSWER TO
27 COMPLAINT FILED BY PLAINTIFFS
28 DENISE ANGELINA DEBRUNNER ET AL.**

1 Date Action Filed: November 23, 2022

2 Trial Date: Not Set

1 Pursuant to Northern District of California Civil Local Rules 7-12, and 16-3(e), PLAINTIFFS
2 DENISE ANGELA DEBRUNNER et al. (“Plaintiffs”) and DEFENDANT CITY AND COUNTY OF
3 SAN FRANCISCO (“Defendant”) through their counsel of record, HEREBY AGREE AND
4 STIPULATE AS FOLLOWS:

5 1. WHEREAS, on November 23, 2022, Plaintiffs filed this action against Defendant. Dkt.
6 No. 1. Plaintiffs are 135 individuals and former or current employees of Defendant. Plaintiffs’
7 Complaint is 207 pages in length, of which 92 pages consist of Plaintiffs’ individual factual allegations
8 against Defendant;

9 2. WHEREAS, on February 2, 2023, the case was reassigned to the Honorable Jeffrey S.
10 White. See Dkt. No. 20;

11 3. WHEREAS, on March 14 and March 15, 2023, attorneys at Seyfarth Shaw, LLP filed
12 notices of appearance with the Court to serve as lead counsel for Defendant. See Dkt. Nos. 31-33;

13 4. WHEREAS, on September 5, 2023, Seyfarth Shaw, LLP withdrew as lead counsel for
14 Defendant pursuant to the Court’s Order.(Dkt. No. 77; Case No. 4:22-cv-04319-JSW). Defendant
15 anticipates substitute counsel will appear in the Consolidated Actions soon;

16 5. WHEREAS, pursuant to the Parties’ Stipulation and the Court’s July 6, 2023 Order, the
17 deadline for City to file an Answer to the Complaint is September 6, 2023. (Dkt. No. 63; 4:22-cv-07455-
18 JSW);

19 6. WHEREAS, the Parties have agreed and respectfully submit that an extension of time for
20 Defendant to file an Answer is necessary for the transition of Defendant’s defense.

21 THEREFORE, IT IS HEREBY STIPULATED AS FOLLOWS:

22 1. The Parties have agreed and respectfully submit that the withdrawal of former counsel for
23 Defendant and its anticipated substitution of new counsel necessitate an extension for Defendant to file
24 an Answer to Plaintiffs’ Complaint.

25 2. Defendant shall file its Answer by September 27, 2023.

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2 **IT IS SO STIPULATED.**
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6 DATED: September 6, 2023
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LIMANDRI & JONNA LLP

8 By: Robert E. Weisenburger
9 ROBERT E. WEISENBURGER
Attorney for Plaintiffs
Denise Debrunner et al.

10 DATED: September 6, 2023
11

DAVID CHIU
City Attorney
LAUREN E. WOOD
ADAM SHAPIRO
Deputy City Attorneys

12 By: Lauren E. Wood
13 LAUREN E. WOOD

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15 Attorneys for Defendant
16 CITY AND COUNTY OF SAN FRANCISCO
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ORDER GRANTING EXTENSION OF TIME TO FILE ANSWER

The Court finds the withdrawal of former counsel for Defendant and its anticipated substitution of new counsel necessitate an extension for Defendant to file an Answer to Plaintiffs' Complaint. Defendant shall file its Answer by September 27, 2023.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 6, 2023

Jeffrey S White

Hon. Jeffrey S. White

UNITED STATES DISTRICT JUDGE